

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
Norfolk Division**

In re: John T. Bianco,
Debtor-in-Possession.

Case No. 15-73678-SCS
Chapter 11

MTGLQ INVESTORS, L.P.

Movant,
v.

John T. Bianco,

Respondent.

**RESPONSE IN OPPOSITION TO
MTGLQ INVESTORS, L.P. MOTION SEEKING RELIEF FROM STAY**

John T. Bianco (the “Debtor”), by counsel, in opposition to the *Motion Seeking Relief from Stay* (the “Motion”) filed by MTGLQ Investors, L.P. (“MTGLQ”) on July 28 2017, states as follows:

1. Admitted.
2. The Debtor denies the accuracy of the payoff and denies any default under the provisions of the confirmed plan. The Debtor admits that accurate copies of the loan documents are attached to the Motion. The Debtor denies MTGLQ’s characterization of the terms of the loan to the extent they are inconsistent with the documents.
3. Admitted.
4. Denied. The Debtor is current to the lien holder pursuant to the provisions of the plan confirmed by this Court.
5. Denied.
6. Denied.

Karen M. Crowley, VSB No. 35881
CROWLEY, LIBERATORE, RYAN & BROGAN, P.C.
Town Point Center, Suite 300
150 Boush Street
Norfolk, VA 23510
Telephone: (757) 333-4500
Facsimile: (757) 333-4501
Counsel for the John T. Bianco

7. Denied.

WHEREFORE, for the foregoing reasons, the Debtor-in-Possession prays that this Court deny the Motion and grant him such other and further relief as is just and appropriate.

DATE: August 11, 2017

JOHN T. BIANCO

BY: /s/ Karen M. Crowley
Of Counsel

Karen M. Crowley, VSB No. 35881
CROWLEY, LIBERATORE, RYAN & BROGAN, P.C.
Town Point Center, Suite 300
150 Boush Street
Norfolk, VA 23510
Telephone: (757) 333-4500
Facsimile: (757) 333-4501
Counsel for John T. Bianco

CERTIFICATE OF SERVICE

I certify that on August 11, 2017, a true copy of the foregoing *Response* was electronically filed with the Clerk of Court using the CM/ECF system, which will send e-mail notice of and serve such filing to those parties who are currently listed on the Electronic Mail Notice List for this Case. In addition, it was sent by first class mail to:

David A. Rosen
BUONASSISI, HENNING & LASH
1861 Wiehle Ave., Ste. 330
Reston, VA 20190

Office of the US Trustee
Room 625, 200 Granby Street
Norfolk, VA 23510

/s/ Karen M. Crowley